

Exhibit A

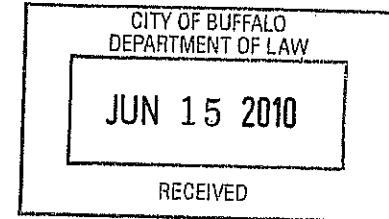
STATE OF NEW YORK
SUPREME COURT : COUNTY OF ERIE

ZACHARY ADAMSON
83 Delham Street
Buffalo, New York 14209,

Claimant,
-against-

CITY OF BUFFALO,
CITY OF BUFFALO POLICE DEPARTMENT,
JOSEPH COOK,
MICHAEL KEANE and
SHARON ACKER,

NOTICE OF CLAIM



Defendants.

PLEASE TAKE NOTICE, that ZACHARY ADAMSON, Claimant, hereby make claims against the CITY OF BUFFALO, CITY OF BUFFALO POLICE DEPARTMENT, JOSEPH COOK, MICHAEL KEANE, SHARON ACKER and their agents, servants and/or employees, hereinafter referred to as "Respondents", for damages and personal injuries sustained. In support of said Notice of Claim, the Claimant states, upon information and belief, as follows:

- 1) NAME AND ADDRESS OF CLAIMANT: ZACHARY ADAMSON, 83 Delham Street, Buffalo, New York 14209.
- 2) NAME AND ADDRESS OF CLAIMANT'S ATTORNEYS: SPADAFORA & VERRASTRO, LLP, JAMES P. VERRASTRO, Of Counsel, 2 Symphony Circle, Buffalo, New York 14201; telephone number 716-854-1111.

3) **TIME OF CLAIM AND PLACE WHERE CLAIM AROSE:** On or about April 1, 2010 at approximately 7:00 p.m., the Claimant, ZACHARY ADAMSON, was lawfully on the premises of 585 Elmwood Avenue, Buffalo, New York, where Claimant was a paying customer of a gas station located on said premises and later, while Claimant was in Police custody, thereafter, at the Buffalo Police Station, where Claimant was taken.

4) **BASIS OF CLAIM:** This claim is based upon injuries suffered and/or sustained and/or aggravation of pre-existing conditions as a result of the negligence, carelessness, misfeasance, malfeasance, and/or intentional acts of the Respondents, CITY OF BUFFALO and/or CITY OF BUFFALO POLICE DEPARTMENT, its agents, servants and/or employees.

ZACHARY ADAMSON suffered injuries, that include, without limitation thereto, physical and emotional and otherwise, as a result of the negligence and/or intentional conduct of the Respondents, their agents, servants and/or employees, resulting in assault, battery, false arrest, false imprisonment, intentional and/or negligent in the infliction of severe physical injuries and emotional distress upon the Claimant as the result of the physical and/or verbal abuse by the agents, servants and/or employees of the Respondents, CITY OF BUFFALO and/or CITY OF BUFFALO POLICE DEPARTMENT.

In addition thereto, said claim is also based upon the negligent and/or careless hiring, supervising, training and employment of Police Officers, agents, servants and/or other employees of the Respondents. This claim is also based upon a violation of Civil Rights, both State and Federal, of the Claimant, ZACHARY ADAMSON.

5) **NATURE OF CLAIM:** Upon information and belief, the Respondents, together with its agents, servants and/or employees, including, without limitation, the Commissioner of the City of Buffalo Police Department were aware of the vicious propensity of certain Police Officers, however, they failed to make proper inquiry as to the same and/or reprimand said Officers and/or discipline said Officers and/or to remove said Officers from additional duties so as to resolve the dangerous situation which existed as of the date the Claimant was injured and/or failed to properly train, teach or supervise its representatives, servants, agents and/or employees so as to ensure the conditions, which then and there existed, and which allowed the physical and verbal abuse of Claimant, together with the violation of his State and Federal Civil Rights by said Police Officers, would have been eliminated so as not to exist as of the date and time wherein said injuries were sustained.

PLEASE TAKE FURTHER NOTICE that all criminal charges filed against Claimant were dismissed on approval by an assigned Judge of the City Court of Buffalo, New York.

6) **INJURIES SUSTAINED:** That as a result of the actions of the Respondents, their agents, servants and/or employees, the Claimant, ZACHARY ADAMSON, was arrested, hand cuffed, taken into custody and subjected to ridicule, embarrassment and abuse, both physical and verbal and has sustained, without limitation thereto, numerous injuries, the majority, if not all, of which are and/or will be severe, painful and permanent in nature, including spinal and/or disc injury, wrist injuries, right foot injury, post traumatic stress disorder, anxiety and depression and also including shock to the nerves and nervous system, circulatory system, traumatic injury to bones, nerves, tendons, vertebrae and disc's, muscular systems and skeletal systems, with resulting impairment and/or loss of use or normal function; was otherwise rendered sick, sore, lame and/or disabled, and was or may be prevented from following his usual duties and activities for a period of time subsequent to this accident; has incurred, or may suffer and sustain loss of earnings and/or loss of future earning potential and/or capacity; has incurred, or may incur hospital expenses, medical expenses, physical therapy and/or rehabilitation expenses, and/or other similar types of expenses, as to past, present or future as would relate to the care, treatment and attempted cure of the injuries sustained and/or the residual effects thereof; has been caused to suffer emotional upset as a result of the pain and suffering associated with the injuries as to the past, present and upon information and belief into said future years; has or may suffer loss in excess of basic economic loss, together with any and all other special and general damages as they manifest themselves subsequent to the date of this Notice of Claim.

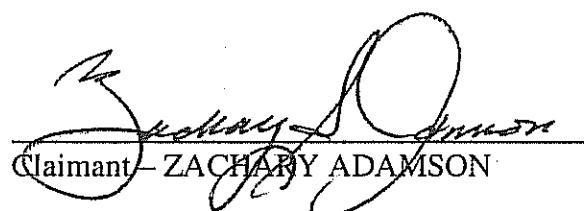
7) **DAMAGES:** The Claimant, ZACHARY ADAMSON, is presently undergoing medical care and treatment and has been or may be caused to expend money and incur expenses for the care and treatment of his injuries. The exact amount of medical expenses is unknown at this time as he is still undergoing treatment. The Claimant would make claim for or among the following damages:

- a) Pain and suffering and all physical injuries sustained.
- b) Emotional upset and/or injury.
- c) Loss of earnings.
- d) Impairment of earning capacity and/or future earnings.
- e) All out of pocket expenses associated with medical, hospital, nursing, physical therapy and any and all other rehabilitative and/or therapy care and treatment rendered as to the cure and/or attempted cure of the injuries sustained by the Claimant, and/or the residual effects thereof, as to the past, present and/or into the future.
- f) Any and all other special and general damages as they may manifest themselves subsequent to the date of this Notice.
- g) As to all of the above, the same would relate to past to present damages and also, present to future damages.

8) Upon your failure to pay such claims within the statutory period provided, it is the intention of the Claimant to commence an action against the Respondents, CITY OF BUFFALO and/or CITY OF BUFFALO POLICE DEPARTMENT, and/or such others as may be liable to recover damages sustained by Claimant as set forth above.

WHEREFORE, the Claimant, ZACHARY ADAMSON, respectfully requests that his Claim be adjusted and paid as provided by law.

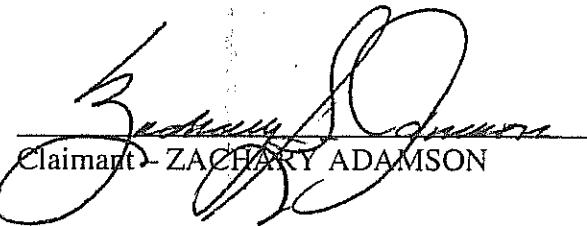
DATED: June 11 2010
Buffalo, New York



The signature is handwritten in black ink. It appears to read "Zachary Adamson" with a stylized "Z" and "A". Below the signature, the word "Claimant" is printed in a smaller, sans-serif font, followed by "ZACHARY ADAMSON".

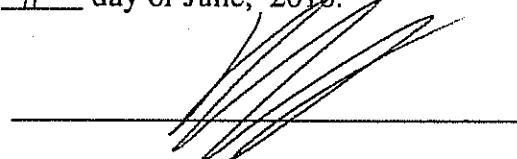
STATE OF NEW YORK)
COUNTY OF ERIE) SS.:

ZACHARY ADAMSON, being duly sworn, deposed and says: That he is the Claimant above-named in the within action; that he has read the foregoing NOTICE OF CLAIM and knows the contents thereof; that same is true to his own knowledge except as to those matters therein stated to be alleged on information and belief, and as to those matters, he believes it to be true.



Claimant - ZACHARY ADAMSON

Sworn to before me this
17th day of June, 2010.



RENEE C. NOODY
Notary Public, State of New York
Qualified in Erie County
My Commission Expires May 29, 2011

TO: CITY OF BUFFALO
BUFFALO CITY HALL
Buffalo, New York 14202

CITY OF BUFFALO POLICE DEPARTMENT
74 Franklin Street
Buffalo, New York 14202